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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Amendment of the Commission's Rules
To Permit Flexible Service Offerings
in the Commercial Mobile Radio Services

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WT Docket No. 96-6

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COMMENTS OF
CENTURY CELLUNET, INC.

Century Cellunet, Inc. ("Century") hereby submits its comments on the Commission's Notice of Proposed Rule Making in the above-captioned proceeding.¹ Century commends the Commission's efforts in initiating this proceeding and developing forward-thinking rules related to the provision of fixed services by wireless licensees. Century fully supports Commission proposals to allow the providers of commercial mobile radio services ("CMRS") the regulatory flexibility to offer wireless local loop and other fixed services. This framework will foster competition in the telecommunications market (both wireless and local exchange), which, in turn, will ultimately benefit the public.

¹ FCC 96-17 (Jan. 25, 1996) ("Notice"). The date for filing comments was extended from February 26, 1996 to March 4, 1996. Order, DA 96-225, 61 Fed. Reg. 7455 (Feb. 28, 1996).

As an operator of numerous cellular systems throughout the nation, Century strongly endorses the Commission's goals of "reduc[ing] any undue regulatory burdens on CMRS providers," "enhanc[ing] competition," and "promot[ing] the development and deployment of new and innovative wireless telecommunications networks."² In pursuit of these goals, the Commission should ensure that *all* CMRS licensees are treated fairly under revised use rules and that such operators are given maximum regulatory flexibility with limited Commission intervention. Specifically, the Commission should grant all CMRS providers similar flexibility to offer fixed wireless local loop service as well as other fixed services. Allowing all wireless carriers to provide a broad range of fixed services will encourage greater efficiency, innovation, competitive pricing, and an expanded catalogue of service offerings.

In light of numerous recent developments and as the Commission is well aware, the telecommunications marketplace is undergoing dramatic change. The Commission's action in this proceeding should help to ensure that existing and future wireless licensees are fully equipped to compete in that environment. For example, whatever fixed services may be provided by personal communications services ("PCS") operations should also be permissible for cellular licensees, all governed by minimal requirements for obtaining prior Commission approval on a case by case basis. This will ensure that no licensee is disadvantaged in the marketplace as a result of disparate regulatory requirements.

² *Id.* at ¶ 27.

Century further endorses the Commission's efforts to simplify the regulatory framework governing the provision of fixed services. The proposed rules will ease the administrative burden on the Commission, as well as licensees and applicants, by eliminating "the need for the Commission to initiate a rule making or grant multiple waivers each time a broadband CMRS provider or new entrant to a market wishes to adjust its operational mode."³ Moreover, permitting all CMRS providers to offer a full range of fixed services including, but not limited to, local loop service will further simplify administrative procedures. This "leaner" regulatory scheme will result in less paperwork, fewer proceedings, and quicker delivery of new services to the public. Moreover, in the absence of regulatory hurdles, CMRS licensees will be able to adapt quickly to technological changes as well as to shifting consumer preferences.


Century appreciates the Commission's initiatives and applauds the efforts not only to minimize regulatory burdens but also to promote competition and regulatory parity. The Commission is moving in the right direction and should take the steps necessary to ensure that the competition envisioned by the *Notice* extends to the entire fixed services market. Accordingly, Century encourages the Commission to act

³ *Id.* at ¶ 9.

promptly to adopt rules affording broad flexibility to all CMRS licensees to provide all fixed services.

Respectfully submitted,

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